

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

**BIANCA JOHNSON and DELMAR
CANADA,**

Plaintiffs,

v.

**ANDREW HOLMES, JOHN DOES 1-3
and ALBEMARLE COUNTY,**

Defendants.

:
:
:
:
:
:
:
:
:
:
:
:

Case No. 3:16cv16

PLAINTIFFS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Jim H. Guynn, Jr.
Guynn & Waddell, P.C.
415 S. College Avenue
Salem, VA 24153

The Plaintiffs, Bianca Johnson and Delmar Canada, by counsel, hereby propounds its Second Request for Production of Documents to Defendant Albemarle County to be answered within thirty (30) days and in accordance with all applicable provisions of Rule 34 of the Fed.R.Civ.P.

Plaintiff requests the production of the following documents:

1. All documents which relate to each traffic stop initiated by Officer Holmes that did not result in the issuance of a summons between 2009 and 2016.
2. All documents that identify ACPD officers assigned to patrol the same District and sector as Officer Holmes between 2009 and 2016 and for each, set forth the number of traffic stops per year, the number of summonses issued per year and the number of arrests per year, all broken down by sex, race and reason for summons or arrest.

Respectfully submitted,

Bianca Johnson and Delmar Canada
By Counsel

s/Jeffrey E. Fogel

Jeffrey E. Fogel, VSB #75643
Attorney at Law
913 E. Jefferson Street
Charlottesville, VA 22902
434-984-0300 (Tel)
434-220-4852 (Fax)
Email: jeff.fogel@gmail.com

Steven D. Rosenfield, VSB #16539
Attorney at Law
913 E. Jefferson Street
Charlottesville, VA 22902
434-984-0300 (Tel)
434-220-4852 (Fax)
Email: attyrosen@aol.com